### BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

**Docket No. 2008-328-C** 

#### **EXHIBIT AA-1 TO**

DIRECT TESTIMONY OF

AUGUST H. ANKUM, PH. D.

#### ON BEHALF OF

TIME WARNER CABLE INFORMATION SERVICES (SOUTH CAROLINA) LLC

1027 Arch, Suite 304 Philadelphia, PA 19107 215 238 1180



August H. Ankum, Ph.D.

Senior Vice President Founding Partner QSI Consulting, Inc. GAnkum@QSIconsulting.com



#### **Biography**

Dr. Ankum is a founding partner of QSI, serves as Senior Vice President, and is the firm's Chief Economist. Dr. Ankum is a practicing economist and consultant specializing in both domestic and international telecommunications issues. Dr. Ankum also practices in QSI's international transfer pricing group. Before co-founding QSI, Dr. Ankum worked directly with a number of the country's largest communications clients in his own practice. Prior to that he served as Senior Economist for MCI Telecommunications Corporation's Public Policy Division, and before that as a Manager in the Regulatory and External Affairs Division of Teleport Communications Group, Inc. (later purchased by AT&T). In his capacity with both MCI and TCG, Dr. Ankum provided expert testimony regarding the economics of telecommunications and public policy in contested proceedings across the country. Dr. Ankum specializes in competitive telephony issues pertaining to removing barriers to entry in local telecommunications markets. Dr. Ankum began his career in telecommunications with the Texas Public Utility Commission, where he served as the Commission Staff's Chief Telecommunications Economist before leaving in 1994.

#### **Educational Background**

Ph.D., Economics
University of Texas, Austin, Texas 1992

Master of Arts, Economics
University of Texas, Austin, Texas 1987

Bachelor of Arts, Economics

Quincy College, Quincy, Illinois

1982

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#### PROCEEDINGS IN WHICH DR. ANKUM HAS FILED EXPERT WITNESS TESTIMONY:

#### Before the California Public Utilities Commission Consolidated Docket

Joint Application of AT&T Communications of California, Inc. (U 5002 C) and WorldCom, Inc. for the Commission to Reexamine the Recurring Costs and Prices of Unbundled Switching in Its First Annual Review of Unbundled Network Element Costs Pursuant to Ordering Paragraph 11 of D.99-11-050

On behalf of ATT and MCI

### Before the Connecticut Department of Public Utility Control Docket No. 02-05-17

DPUC Investigation of Intrastate Carrier Access Charges
On behalf of AT&T and MCI

# Before the Delaware Public Service Commission PSC Docket No. 00-025

Petition of Focal Communications Corporation of Pennsylvania For Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Bell Atlantic – Delaware, Inc.

On behalf of Focal Communications Corporation of Pennsylvania

### Before the Florida Public Utilities Commission Docket No. 990649B-TP

Investigation into Pricing of Unbundled Network Elements
On behalf of AT&T Communications of the Southern States, Inc. MCImetro Access
Transmission Services, LLC & MCI WorldCom Communications, Inc., Florida Digital Network,
Inc. (collectively called the "ALEC Coalition").

### Before the Florida Public Utilities Commission Docket No. 030829-TP

In the Matter of Complaint of FDN Communications for Resolution of Certain Billing Disputes and Enforcement of UNE Orders and Interconnection Agreements with BellSouth Telecommunications, Inc.

On behalf of Florida Digital Network, Inc. d/b/a FDN Communications

### Before the Georgia Public Service Commission Docket No. 6352-U.

AT&T Petition for the Commission to Establish Resale Rules, Rates and terms and Conditions and the Initial Unbundling of Services

On behalf of MCI Telecommunications Corporation

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### Before the Illinois Commerce Commission Docket No. 94-0048

Adoption of Rules on Line-Side Interconnection and Reciprocal Interconnection On behalf of Teleport Communications Group, Inc.

### Before the Illinois Commerce Commission Docket No. 94-0096

Proposed Introduction of a Trial of Ameritech's Customer First Plan in Illinois On behalf of Teleport Communications Group, Inc.

# Before the Illinois Commerce Commission Docket No. 94-0117

Addendum to Proposed Introduction of a Trial of Ameritech's Customer First Plan in Illinois On behalf of Teleport Communications Group, Inc.

#### Before the Illinois Commerce Commission Docket No. 94-0146

AT&T's Petition for an Investigation and Order Establishing Conditions Necessary to Permit Effective Exchange Competition to the Extent Feasible in Areas Served by Illinois Bell Telephone Company

On behalf of Teleport Communications Group, Inc.

# Before the Illinois Commerce Commission Docket No. 95-0315

Proposed Reclassification of Bands B and C Business Usage and Business Operator Assistance/Credit Surcharges to Competitive Status

On behalf of MCI Telecommunications Corporation.

#### Before the Illinois Commerce Commission Docket 94-480

Investigation Into Amending the Physical Collocation Requirements of 83 Ill. Adm. Code 790 On behalf of MCI Telecommunications Corporation.

### Before the Illinois Commerce Commission Docket No. 95-0458

Petition for a Total Local Exchange Wholesale Tariff from Illinois Bell Telephone Company d/b/a Ameritech Illinois and Central Telephone Company Pursuant to Section 13-505.5 of the Illinois Public Utilities Act

On behalf of MCI Telecommunications Corporation.

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### Before the Illinois Commerce Commission Docket No. 95-0296

Citation to Investigate Illinois Bell Telephone Company's Rates, Rules and regulations For its Unbundled Network Component Elements, Local Transport Facilities, and End office Integration Services

On behalf of MCI Telecommunications Corporation.

### Before the Illinois Commerce Commission Docket No. 96-AB-006

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Illinois Bell Telephone Company d/b/a Ameritech Illinois

On behalf of MCI Telecommunications Corporation.

### Before the Illinois Commerce Commission Docket No. 96-AB-007

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Central Telephone Company of Illinois ("Sprint")

On behalf of MCI Telecommunications Corporation.

#### **Before the Illinois Commerce Commission**

Docket No. 96-0486

Investigation into forward looking cost studies and rates of Ameritech Illinois for interconnection, network elements, transport and termination of traffic.

On behalf of MCI Telecommunications Corporation.

### Before the Illinois Commerce Commission Docket No. 98-0396.

Phase II of Ameritech Illinois TELRIC proceeding On behalf of MCIWorldCom.

### Before the Illinois Commerce Commission Docket No. 00-0700

Illinois Commerce Commission On its Motion vs Illinois Bell Telephone Company Investigation into Tariff Providing Unbundled Local Switching with Shared Transport

On behalf of AT&T Communications of Illinois, Inc., and WorldCom, Inc.

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### Before the Illinois Commerce Commission Docket No. 02-0864

In the Matter of: Illinois Bell Telephone Company, Filing to Increase Unbundled Loop and Nonrecurring Rates (Tariffs Filed December 24, 2002)

On Behalf of WorldCom, Inc., McLeodUSA Telecommunications Services, Inc., Covad Communications Company, TDS Metrocom, LLC, Allegiance Telecom of Illinois, Inc., RCN Telecom Services of Illinois, LLC., Globalcom, Inc., Z-Tel Communications, Inc., XO Illinois, Inc., Forte Communications, Inc., CIMCO Communications, Inc.

### Before the Indiana Regulatory Commission Cause No. 39948

In the matter of the Petition of MCI Telecommunications Corporation for the Commission to Modify its Existing Certificate of Public Convenience and Necessity and to Authorize the Petitioner to Provide certain Centrex-like Intra-Exchange Services in the Indianapolis LATA Pursuant to I.C. 8-1-2-88, and to Decline the Exercise in Part of its Jurisdiction over Petitioner's Provision of such Service. Pursuant to I.C. 8-1-2.6.

On behalf of MCI Telecommunications Corporation

# Before the Indiana Regulatory Commission Cause No. 40178

In the matter of the Petition of Indiana Bell Telephone company, Inc. For Authorization to Apply a Customer Specific Offering Tariff to Provide the Business Exchange Services Portion of Centrex and PBX Trunking Services and for the Commission to Decline to Exercise in Part Jurisdiction over the Petitioner's Provision of such Services, Pursuant to I.C. 8-1-2.6

On behalf of MCI Telecommunications Corporation.

### Before the Indiana Regulatory Commission Cause No. 40603-INT-01

MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Indiana Bell Telephone Company d/b/a Ameritech Indiana

On behalf of MCI Telecommunications Corporation.

### **Before the Indiana Regulatory Commission**

Cause No. 40611

In the matter of the Commission Investigation and Generic Proceeding on Ameritech Indiana's Rates for Interconnection Service, Unbundled Elements and Transport and Termination under the Telecommunications Act of 1996 and Related Indiana Statutes

On behalf of MCI Telecommunications Corporation.

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### Before the Indiana Regulatory Commission Cause No. 40618

In the Matter of the Commission Investigation and Generic Proceeding on GTE's Rates for Interconnection, Service, Unbundled Elements, and Transport under the FTA 96 and related Indiana Statutes

On behalf of MCI Telecommunication Corporation.

### Before the Indiana Regulatory Commission Cause No. 40611-S1

In the matter of the Commission Investigation and Generic proceeding on the Ameritech Indiana's rates for Interconnection, Unbundled Elements, and Transport and Termination Under the Telecommunications Act of 1996 and Related Indiana Statutes

On behalf of WorldCom, Inc., AT&T Communications of Indiana, G.P.

### Before the Indiana Utility Regulatory Commission Cause No. 42393

In the Matter of the Commission Investigation and Generic Proceeding of Rates and Unbundled Network Elements and Collocation for Indiana Bell Telephone Company, Incorporated D/B/A SBC Indiana Pursuant to the Telecommunications Act of 1996 and Related Indiana Statues.

On Behalf of WorldCom, Inc. ("MCI") McLeodUSA Telecommunications Services, Inc., Covad Communications Company, Z-Tel Communications, Inc.

### Before the Iowa Department of Commerce Utilities Board Docket No: RPU-00-01

US West Communications, Inc., On behalf of McLeodUSA.

### **Before the Maryland Public Utilities Commission**

**Case No. 8988** 

In The matter, The Implementation Of The Federal Communications Commission's Triennial Review Order.

On Behalf of Cavalier Telephone, LLC

### Before the Massachusetts Department of Energy and Transportation D.P.U. 96-83

NYNEX/MCI Arbitration

On behalf of MCI Telecommunications Corporation.

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### Before the Massachusetts Department of Energy and Transportation Docket 01-20

Investigation into Pricing based on TELRIC for Unbundled Network Elements and Combinations of Unbundled Networks Elements and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services.

On behalf Allegiance, Network Plus, Inc., El Paso Networks, LLC, and Covad Communications Company.

### Before the Massachusetts Department of Energy and Transportation Docket 01-03

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Regulatory Plan to succeed Price Cap Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' intrastate retail telecommunications services in the Commonwealth of Massachusetts

On behalf of Network Plus, Inc.

### Before the Commonwealth Of Massachusetts Department Of Telecommunications and Energy D.T.E. 03-60

Proceeding by the Department on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass market Customers

On Behalf of Conversent Communications of Massachusetts, LLC

### Before the Michigan Public Service Commission Case No. U-10647

In the Matter of the Application of City Signal, Inc. for an Order Establishing and Approving Interconnection Arrangements with Michigan Bell Telephone Company
On behalf of Teleport Communications Group, Inc.

### Before the Michigan Public Service Commission Case No. U-10860

In the Matter, on the Commission's Own Motion, to Establish Permanent Interconnection Arrangements Between Basic Local Exchange Providers
On behalf of MCI Telecommunications Corporation.

### Before the Michigan Public Service Commission Case No. U-11280

In the Matter, on the Commission's Own Motion, to consider the total service long run incremental costs and to determine the prices for unbundled network elements, interconnection services, resold services, and basic local exchange services for Ameritech Michigan On behalf of MCI Telecommunications Corporation.

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#### **Before the Michigan Public Service Commission**

Case No. U-11366

In the matter of the application under Section 310(2) and 204, and the complaint under Section 205(2) and 203, of MCI Telecommunications Corporation against AMERITECH requesting a reduction in intrastate switched access charges

On behalf of MCI Telecommunications Corporation.

### Before the Michigan Public Service Commission

Case No. U-13531

In the matter, on the Commission's own motion, to review the costs of telecommunications services provided by SBC Michigan

On behalf of AT&T, Worldcom, Inc., McLeodUSA and TDS Metrocom.

### Before the Michigan Public Service Commission

Case No. U-11831

In the Matter of the Commission's own motion, to consider the total service long run incremental costs for all access, toll, and local exchange services provided by Ameritech Michigan On behalf of MCIWorldCom, Inc.

### **Before the Michigan Public Service Commission**

Case No. U-11830

In the matter of Ameritech Michigan's Submission on Performance Measures, Reporting, and Benchmarks, Pursuant to the October 2, 1998 Order in Case No. U-11654

On behalf of Covad Communications, McLeodUSA Telecommunications Services, Inc., LDMI Telecommunications Inc., Talk America Inc., and XO Communications Services, Inc.

# Before the Minnesota Public Utilities Commission PUC Docket No. P-442, 421, 3012 /M-01-1916

In Re Commission Investigation Of Qwest's Pricing Of Certain Unbundled Network Elements, On behalf of Otter Tail Telecom, Val-Ed Joint Venture D/B/A 702 Communications, McCleoudUSA, Eschelon Telecommunications, USLink.

#### **Before the Minnesota Public Utilities Commission**

PUC Docket No . P-421/AM-06-713

OAH Docket No. 3-2500-17511-2

In the Matter of Qwest Corporation's Application for Commission Review of TELRIC rates Pursuant to 47 U.S.C. § 251

On Behalf of Integra Telecom of Minnesota, Inc.; McLeodUSA Telecommunications Services, Inc.; POPP.com, Inc.; DIECA Communications, Inc., d/b/a Covad Communications Company; TDS Metrocom; and XO Communications of Minnesota, Inc.

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### Before the Minnesota Public Utilities Commission PUC Docket #P-421/CI-05-1996 OAH Docket No. 12-2500-17246-2

In the Matter of a Potential Proceeding to Investigate the Wholesale Rate Charged by Qwest On behalf of Integra Telecom of Minnesota, Inc., McLeodUSA Telecommunications Service, Inc., POPP.com, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, TDS Metrocom, and XO Communications of Minnesota, Inc.

#### **Before the New Jersey Board of Public Utilities**

Petition of Focal Communications Corporation of New Jersey For Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Bell Atlantic

On behalf of Focal Communications Corporation of New Jersey.

# Before the New Jersey Board of Public Utilities Docket No. TO00060356

I/M/O the Board's Review of Unbundled Network Elements Rates, Terms and Conditions of Bell Atlantic-New Jersey, Inc. New Jersey Board of Public Utilities, On behalf of WorldCom, Inc.

### Before the State Of New Jersey Public Service Commission Docket No. TO03090705

In The Matter, The Implementation Of the Federal Communications Commission's Triennial Review Order

On Behalf of Conversent Communications of New Jersey, LLC

### Before The New Mexico State Corporation Commission Docket No. 96-307-TC

Brooks Fiber Communications of New Mexico, Inc. Petition for Arbitration On behalf of Brooks Fiber Communications of New Mexico, Inc.

# Before The New Mexico State Corporation Commission Utility Case No. 3495, Phase B

In the matter of the consideration of costing and pricing rules for OSS, collocation, shared transport, non-recurring charges, spot frames, combination of network elements and switching. On behalf of the Commission Staff.

### Before the New York Public Service Commission Case Nos. 95-C-0657, 94-C-0095, 91-C-1174

Commission Investigation into Resale, Universal Service and Link and Port Pricing

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On behalf of MCI Telecommunications Corporation.

### Before the New York Public Service Commission Case 99-C-0529

In the Matter of Proceeding on Motion of the Commission To Reexamine Reciprocal Compensation On Behalf Of Cablevision LightPath, Inc.

### Before the New York Public Service Commission Case 98-C-1357

Proceeding on the Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements

On behalf of Corecomm New York, Inc.

#### **Before the New York Public Service Commission**

Case 98-C-1357

Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements

On behalf of MCIWorldCom.

### Before the State Of New York Public Service Commission CASE 02-C-1425

In The Matter, Proceeding on Motion of the Commission to Examine the Processes, and Related Costs of Performing Loop Migrations on a More Streamlined (e.g., Bulk) Basic

On Behalf of Conversent Communications of New York, LLC

### Before the Public Utilities Commission of Ohio Case No. 96-888-TP-ARB

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish and Interconnection Agreement with Ameritech Ohio

On behalf of MCI Telecommunications Corporation.

# Before the Public Utilities Commission of Ohio Case No. 96-922-TP-UNC.

In the matter of the review of Ameritech Ohio's economic costs for interconnection, unbundled network elements, and reciprocal compensation for transport and termination of local telecommunications traffic

On behalf of MCI Telecommunications Corporation.

### Before the Public Utilities Commission of Ohio Case No. 00-1368-TP-ATA

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In the Matter of the Review of Ameritech Ohio's Economic Costs for Interconnection, Unbundled Network Elements, and Reciprocal Compensation for Transport and Termination of Local Telecommunications Traffic. Case No. 96-922-TP-UNC and In the Matter of the Application of Ameritech Ohio for Approval of Carrier to Carrier Tariff

On behalf of MCIWorldCom and ATT of the Central Region.

## Before the Public Utilities Commission of Ohio Case No. 97-152-TP-ARB

In the matter of the petition of MCI Telecommunications Corporation for arbitration pursuant to section 252(b) of the Telecommunications Act of 1996 to establish an interconnection agreement with Cincinnati Bell Telephone Company

On behalf of the MCI Telecommunications Corporation

### Before the Pennsylvania Public Utility Commission Docket No. I-00940035

In Re: Formal Investigation to Examine Updated Universal Service Principles and Policies for telecommunications Services in the Commonwealth Interlocutory order, Initiation of Oral Hearing Phase

On behalf of MCI Telecommunications Corporation.

# Before the Pennsylvania Public Utility Commission Docket No. M-0001352

Structural Separation of Verizon On behalf of MCI WorldCom.

#### Before the Puerto Rico Telecommunications Regulatory Board

Docket No. 97-0034-AR

Petition for Arbitration Pursuant to 47 U.S.C. & (b) and the Puerto Rico Telecommunications Act of 1996, regarding Interconnection Rates Terms and Conditions with Puerto Rico Telephone Company On behalf of Cellular Communications of Puerto Rico, Inc.

### Before the State Of Rhode Island And Providence Plantations Public Utilities Commission Docket No. 2252

Comprehensive Review of Intrastate Telecommunications Competition On behalf of MCI Telecommunications Corporation.

### Before the State Of Rhode Island And Providence Plantations Public Utilities Commission Docket Nos. 3550 and 2861

In The Matter, Implementation of the Requirements of the FCC's Triennial Review Order ("TRO") On behalf of Conversent Communications of Rhode Island, LLC

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### Before the Tennessee Public Service Commission Docket No. 96-00067

Avoidable Costs of Providing Bundled Services for Resale by Local Exchange Telephone Companies On behalf of MCI Telecommunications Corporation.

## Before the Public Utility Commission of Texas Docket No. 7790

Petition of The General Counsel for an Evidentiary Proceeding to Determine Market Dominance On behalf of the Public Utility Commission of Texas.

### Before the Public Utility Commission of Texas Docket No. 8665

Application of Southwestern Bell Telephone Company for Revisions to the Customer Specific Pricing Plan Tariff

On behalf of the Public Utility Commission of Texas.

# Before the Public Utility Commission of Texas Docket No. 8478

Application of Southwestern Bell Telephone Company to Amend its Existing Customer Specific Pricing Plan Tariff: As it Relates to Local Exchange Access through Integrated Voice/Data Multiplexers

On behalf of the Public Utility Commission of Texas.

### Before the Public Utility Commission of Texas Docket No. 8672

Application of Southwestern Bell Telephone Company to Provide Custom Service to Specific Customers

On behalf of the Public Utility Commission of Texas.

# Before the Public Utility Commission of Texas Docket No. 8585

Inquiry of the General Counsel into the Reasonableness of the Rates and Services of Southwestern Bell Telephone Company

On behalf of the Public Utility Commission of Texas.

### Before the Public Utility Commission of Texas Docket No. 9301

Southwestern Bell Telephone Company Application to Declare the Service Market for CO LAN Service to be Subject to Significant Competition

On behalf of the Public Utility Commission of Texas.

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### Before the Public Utility Commission of Texas Docket No. 10382

Petition of Southwestern Bell Telephone Company for Authority to Change Rates On behalf of the Public Utility Commission of Texas.

### Before the Public Utility Commission of Texas Docket No. 14658

Application of Southwestern Bell Telephone Company, GTE Southwest, Inc., and Contel of Texas, Inc. For Approval of Flat-rated Local Exchange Resale Tariffs Pursuant to PURA 1995 Section 3.2532

On behalf of Office of Public Utility Counsel of Texas.

### Before the Public Utility Commission of Texas Docket No. 14658

Application of Southwestern Bell Telephone Company, GTE Southwest, Inc., and Contel of Texas, Inc. For Interim Number Portability Pursuant to Section 3.455 of the Public Utility Regulatory Act On behalf of Office of Public Utility Counsel of Texas.

#### Before the Public Utility Commission of Texas Docket Nos. 16226 and 16285

Application of AT&T Communications for Compulsory Arbitration to Establish an Interconnection Agreement Between AT&T and Southwestern Bell Telephone Company, and Petition of MCI for Arbitration under the FTA96

On behalf of AT&T and MCI.

### Before the Public Utility Commission of Texas Docket No. 21982

Proceeding to examine reciprocal compensation pursuant to section 252 of the Federal Telecommunications of 1996

On behalf of Taylor Communications.

### Before the Public Utility Commission of Texas Docket No. 25834

Proceeding on Cost Issues Severed from PUC Docket 24542 On behalf of AT&T and MCIMetro.

#### Before the Public Utility Commission of Texas SOAH Docket No. 473-07-1365 PUC Docket No. 33545

Application of McLeodUSA Telecommunications Services, Inc. for Approval of Intrastate Switched Access rates Pursuant to PURA Section 52.155 and PUC Subst. R. 26.223

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On behalf of McLeodUSA Telecommunications Services

### Before the Utah public Service Commission Docket No. 01-049-85

In the Matter of the Determination of the Costs Investigation of the Unbundled Loop of Qwest Corporation, Inc.

On behalf of AT&T and WorldCom.

### Before the Vermont Public Service Board Docket No. 5713

Investigation into NET's tariff filing re: Open Network Architecture, including the Unbundling of NET's Network, Expanded Interconnection, and Intelligent Networks

On behalf of MCI Telecommunications Corporation.

### Before the Public Service Commission of Wisconsin

**Cause No. 05-TI-138** 

Investigation of the Appropriate Standards to Promote Effective Competition in the Local Exchange Telecommunications Market in Wisconsin

On behalf of MCI Telecommunications Corporation.

### Before the Public Service Commission of Wisconsin Docket 670-TI-120

Matters relating to the satisfaction of conditions for offering interLATA services (Wisconsin Bell, Inc. d/b/a Ameritech Wisconsin)

On behalf of MCI Telecommunications Corporation.

### Before the Public Service Commission of Wisconsin Docket Nos. 6720-MA-104 and 3258-MA-101

In the Matter of MCI Telecommunications Corporation Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Wisconsin Bell, Inc. d/b/a Ameritech Wisconsin

On behalf of MCI Telecommunications Corporation.

### Before the Public Service Commission of Wisconsin Docket No. 05-TI-349

Investigation Into The Establishment of Cost-Related Zones For Unbundled Network Elements, On behalf of AT&T Communications of Wisconsin, McLEODUSA Telecommunications Services, Inc., TDS MetroCom, Inc., and Time Warner Telecom.

### Before the Public Service Commission of Wisconsin Docket No. 6720-TI-161

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Investigation into Ameritech Wisconsin's Unbundled Network Elements
On Behalf Of AT&T Communications of Wisconsin, Inc., WorldCom, Inc., Rhythms Links, Inc.,
KMC Telecom, Inc., and McLeodUSA ("CLEC Coalition")